



STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS
AND ELECTION PRACTICES
135 STATE HOUSE STATION
AUGUSTA, MAINE
04333-0135

Minutes of the February 27, 2007 Meeting of the
Commission on Governmental Ethics and Election Practices
Held in the Commission's Meeting Room,
PUC Building, 242 State Street, Augusta, Maine

Present: Hon. Andrew Ketterer, Chair; Hon. Jean Ginn Marvin; Hon. Mavourneen Thompson;
Hon. Vinton Cassidy, Hon. Michael Friedman. Staff: Executive Director Jonathan Wayne;
Phyllis Gardiner, Counsel.

At 9:10 A.M., Chair Andrew Ketterer convened the meeting. Mr. Ketterer reminded the group that the items on the agenda are from the February 14 meeting that was rescheduled to today due to bad weather. Also new matters will be discussed.

Agenda Item #1 – Proposed Rule Changes rescheduled for March 9 meeting.

Agenda Item #2 – Ratification of the Minutes of the October 13, October 20, and November 2 Meetings

Mr. Wayne noted that there is a name correction on the October 20 meeting and November 2 meeting had a company (Ourso Beychok) referred to as an individual.

Ms. Ginn Marvin moved and Ms. Thompson seconded to accept the minutes as amended. The motion passed (5-0).

Agenda Item #3 – Assessment of Civil Penalty for Late Filing/Hon. Joshua A. Tardy

Mr. Wayne explained that Rep. Tardy ran as a traditional candidate in the 2006 election against a Clean Election Act candidate. This required him to file three additional reports, one of which was to be filed when his cash receipts or expenditures went over a certain amount. Since Representative Tardy did not realize that he had gone over that threshold, he did not file this

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report. He did, however, fix the error as soon as he realized it. His opponent was not disadvantaged in any way. Rep. Tardy sent a letter saying that he did not object to the penalty.

Mr. Wayne feels Rep. Tardy was acting in good faith and qualifies for an exception in his penalty. The staff recommends a \$724.71 penalty.

Rep. Tardy was present at the meeting but said that he had nothing further to add to what Mr. Wayne said or to what he wrote in his letter.

Ms. Ginn Marvin moved, Mr. Cassidy seconded to adopt the staff recommendation and impose a penalty in the amount of \$724.71. The motion passed (5-0).

Agenda Item #4 –Request for Guidance/Hon. Thomas B. Saviello

Mr. Wayne explained that Rep. Saviello is requesting advice on a conflict of issue matter. Mr. Wayne introduced the various issues confronting Rep. Saviello in the current session of the Legislature. These issues are more thoroughly discussed in the memorandum on this matter that Mr. Wayne wrote for the Commission. There are at least two bills that will be introduced this session that deal with the regulation of emissions of power plants. These bills are a part of a regional effort in the Northeast states to combat the effects of power plant emissions. Rep. Saviello seeks guidance from the Commission on whether he has a conflict of interest in regards to these bills. He is employed by Verso Paper as its environmental manager at its Jay plant. In at least one of the bills, Verso may be required to purchase emissions allowances, which could cost millions of dollars.

Ms. Thompson requested some background information on a prior conflict of interest issue with Representative Saviello during the last legislative session. Mr. Wayne presented a synopsis of the matter considered by the Commission last year.

Mr. Wayne referred the Commission members to the section of the legislative ethics law that he thought was most relevant in this situation: “Where a legislator derives a direct substantial personal financial benefit from close association with a person.” So in this case, Rep. Saviello

does derive a financial benefit (his salary) from close economic association with Verso Paper, Mr. Saviello's employer. Mr. Wayne urged the Commission to consider there could be a substantial financial effect to Verso Paper.

Ms. Ginn Marvin stated she interpreted the law as meaning if the person derived a benefit different from anyone else, like a bonus to that person.

Mr. Ketterer pointed out that the smaller number of people or entities affected by legislation gets, the more likely it gets that someone derives a unique benefit.

Rep. Saviello, District #90, addressed the Commission. He expressed his concern over being able to participate in discussions regarding these bills, being able to vote, and being able to represent his constituents in a fair manner. He requested that the Commission consider his professional and academic background and how that can add to the level of discussion and understanding in the debate on these bills. He asked the Commission to consider three other factors in making their decision. First, he is only one of 186 Legislators and is not single-handedly so powerful that he could get his colleagues to vote his way. Second, he is not on the Natural Resources Committee, nor Utilities and Energy. He is on the Inland Fisheries and Wildlife Committee. Third, he does not have any direct financial interest in Verso Paper; he holds no stocks in Verso and Verso is not a publicly traded company. He also asked the Commission to consider the fact that he represents constituents who depend on the mill for their livelihood and the company's contribution to the community. Rep. Saviello stated that he received over 75% of the vote and that if his constituents were dissatisfied with him or that he had a conflict of interest, they would have voted him out.

Mr. Friedman asked if Rep. Saviello would get any special benefit for getting legislation passed, or receive any better job offers as a result of being in the Legislature. Rep. Saviello said that he did not.

Ms. Thompson asked whether Rep. Saviello could only participate in discussions and not actually vote. Rep. Saviello replied that he believes he could not do one without the other.

Mr. Dylan Voorhees of the Natural Resources Council of Maine addressed the Commission. Mr. Voorhees stated that he views paragraphs A, E, and F of §1014(1) as describing different types of conflict of interest. Mr. Voorhees thought that paragraph A seemed to relevant in this case. He said that under that paragraph he did not think that any private benefit to Rep. Saviello was a factor. However, NRCM feels that there is a direct economic connection as Rep. Saviello is an employee of Verso and that any person working for the six mills should not participate in any legislation regarding RGGI given that the financial impact on the companies is significant.

Mr. Cassidy asked if any NRCM members were Legislators. Mr. Voohees replied that he was not sure but that it was likely that there were. Mr. Cassidy asked if it would be appropriate for Legislators who were NRCM members to vote on these bills. Mr. Voorhees said that NRCM did not have a financial interest in the bills. He drew a distinction between NRCM employees and members.

Mr. Friedman pointed to the part of §1014 that states “or derives a direct substantial personal financial benefit.” Mr. Friedman asked whether Mr. Voorhees interpreted that as Rep. Saviello’s salary. Mr. Friedman questioned whether the type of work Rep. Saviello performs would make any difference in the type of conflict of interest. Mr. Voorhees said that he was not sure and would have to look further into the definition. But he did think that it was possible that a janitor who was a Legislator to have a similar close economic association as Rep. Saviello.

Ms. Ginn Marvin pointed out that he is only one out of 151 House members and wonder how much of an effect Rep. Saviello could have on the vote. He does have the expertise and authority in this area and, if she were a Legislator, she would listen to what he had to offer. She does not see any harm in allowing him to vote since he has the knowledge that would benefit other Legislators’ decisions.

Mr. Voorhees stated that Mr. Saviello’s influence, whether large or small is not the issue, the conflict of interest still exists. His employer has a direct financial interest with this legislation.

Ms. Ginn Marvin was concerned that Legislators would lose the benefit from hearing the issues debated and discussed by their colleagues who have specialized knowledge about issues that are the subject of legislation. Mr. Voorhees said that this was a particularly difficult decision to make and there were certain trade offs that may have to be made to ensure the public's confidence in the integrity of the Legislature.

Mr. Cassidy noted that we need to keep in mind how the bills will affect jobs in the state.

Ms. Thompson asked Mr. Voorhees if a Legislator can give factual information without being persuasive. Mr. Voorhees said that it would be a very slippery slope.

Dan Riley, Esq., of Bernstein Shur, indicated he is here on behalf of no one, just an interested party. He was involved with the matter that was before the Commission last year, which involved Rep. Saviello. Mr. Riley found it troubling what Rep. Saviello went through last year. This issue is critical to the nature of the citizen legislature. The balance of opinion that needs to be brought to bear on the consideration of legislative matters is lost if members of the public who work for manufacturing organizations (mills) do not feel comfortable serving in the Legislature and representing their constituents because of this sort of issue. Mr. Saviello's background and expertise is very important to other Legislators that do not have a great deal of knowledge in this area. NRCM has board members serving on the Natural Resources Committee – no one claims conflict of interest there.

In his experience working at the State House, the clause of section 1014(1)(A), which states, "direct substantial personal financial interest distinct from that of the general public" and the clause in paragraph (F) of §1014(1), "benefit has to be unique from that of the general public and persons engaged in similar professions, trades, employment" have been read together by the Attorney General and the presiding officers and their counsels. This interpretation creates a bright line. It could be more artfully drawn perhaps, but it is bright. It states that, as a Legislator, you or family have to directly and personally benefit financially which is different from anyone else in the class. That unique benefit is the quid pro quo of a conflict of interest.

Mr. Riley strongly urged, if that distinction is not made, you put at risk our citizen legislature and severely diminish the group who can act as Legislators.

Ms. Thompson asked about the appearance of misconduct by Legislators. Mr. Riley responded that the only appearance of misconduct would be if the Legislator directly benefited financially.

Kim Davis, former Legislator from Augusta, addressed the Commission. Because Maine has a citizen legislature, many of its members have many issues about which they feel very passionate. She stated that she has spoken out very passionately about certain issues in front of the Health and Human Services Committee and supposes that her purpose could be misconstrued because her husband works in that area. She feels Rep. Saviello has always been very respectable and is in the Legislature for all the right reasons.

Rep. Saviello made one final comment that the interests of his constituents were also at stake in this legislation because of the potential for increasing the cost of electricity.

There being no further public comment, Mr. Ketterer asked Mr. Wayne if he had any concluding comments.

Mr. Wayne concluded that most of the comments today pertained to any harm that could come from Rep. Saviello voting on these issues. Rep. Saviello should be commended for coming forward on this matter. Mr. Wayne also confirmed that this does affect a small group of organizations. There is an argument since the financial affect to Verso could be \$5 to \$15 million dollars so there could be conflict of interest for Rep. Saviello to vote on either of these bills.

Even though there are several cases that deal with whether a Legislator derives a personal benefit from proposed legislation, that is not the whole universe of what constitutes a conflict of interest. There are other ways to interpret the statute. Mr. Wayne pointed out that if there were a payment from the State to Verso that none of the other power plants received, that would be a conflict of

interest if Rep. Saviello voted on that particular bill. We have not seen that exact legislation, but if it were to be presented that way, Mr. Wayne feels that would be a direct conflict of interest.

Mr. Cassidy reminded the group that these 5 – 7 plants employ many people and jobs are affected. Every one of the Legislators at some point is going to deal with bills that affect their area. Mr. Cassidy strongly believes if it does not benefit the Legislator's family then that is where the line should be drawn.

There being no further comments, a motion by Ms. Thompson that the Commission recommend Rep. Saviello participate in discussions about all legislation facing his committee, providing factual information pertaining to this particular legislation, but that he recuse himself from voting on the legislation that is relevant to the topic before us when it is before the House.

The motion failed to receive a second.

Mr. Friedman noted that any decision would be an individual one involving a particular bill. It is difficult to recommend or advise on whether to refrain from doing something until there is an actual bill to reference. We could give advice on whether he can participate in the process, and if the bill surfaces, then Rep. Saviello would make the decision.

Mr. Cassidy stated that he does not believe in restricting any Legislator to what he or she can and cannot talk about or be involved with. We need to trust in our representatives to do the right thing and let Rep. Saviello go do his job at the State House.

Mr. Friedman stated in the legislative area conflict of interest issues should be kept to a minimum. The make up of the Legislature is working people who give up much of their time, and where they are employed should not be a disqualification. Mr. Friedman believes it would be a disservice to the public to start excluding Legislators from voting on issues that deal with their area of expertise.

Ms. Ginn Marvin commented that she agrees with Mr. Cassidy, Rep. Saviello should just do his job at the State House.

Ms. Thompson referred to §1014's conflict of interest and appearance of misconduct by Legislators. She also spoke of the interpretation by 'the man on the street' and how it would look. She believes Rep. Saviello can provide factual information, but should recuse himself from any final votes on these bills.

Mr. Ketterer commended Rep. Saviello for coming in to get some advice in advance. He agrees with Ms. Thompson regarding the need to avoid appearance of impropriety, but acknowledged that it was difficult to advise without a particular bill. Maine does not want a full time Legislature, we want different people who bring different skills and knowledge to the Legislature. The Commission does not want to get into the practice that would exclude votes by certain Legislators. Mr. Ketterer agreed with Mr. Friedman, unless there is a particular bill to be discussed, it is difficult to give direct advice.

Mr. Friedman motioned that the Commission issue an advisory opinion which indicates it would not be a conflict of interest for Rep. Saviello to participate in the legislative process with regard to the RGGI initiative but the Commission would strongly urge Rep. Saviello to consider whether he should recuse himself from voting on any particular bill regarding RGGI which may affect Verso, so any conflict is avoided.

Ms. Thompson seconded this motion.

Mr. Cassidy reiterated that he does not feel the Legislators should be restricted in any way from performing their duties on any initiatives. He opposes this motion.

Ms. Ginn Marvin asked whether an employer would need to be named in the bill.

Mr. Friedman feels it would be an individual decision, naming employer is not a factor. Rep. Saviello will need to make the ultimate decision whether it is a conflict to vote.

Ms. Ginn Marvin noted that in her six years in the Legislature, she does not recall there being a conflict of interest being brought up. The nature of the citizen's legislature means there is a connection with all Legislators at some point to the issues. The Commission needs to be cautious about restricting.

Mr. Cassidy asked why we need a motion.

Mr. Friedman suggested that since Rep. Saviello asked for advice, he deserves to know where the Commission stands.

Ms. Gardiner advised that procedurally, the Commission has been asked to give an advisory opinion, so really need to provide something.

Rep. Saviello expressed concern over whether he would be allowed to vote on workers compensation and tax issues since they all affect Verso Paper.

Mr. Friedman stated that was not his intent. He does not want to restrict Rep. Saviello.

Mr. Friedman reiterated that his motion pertained only to the REGGI initiative bill and Ms. Thompson concurred.

Mr. Ketterer asked for a vote on Mr. Friedman's motion. Vote was 3 in favor, 2 opposed (Ms. Ginn Marvin and Mr. Cassidy opposed) to adopt the pending motion.

Mr. Wayne explained that Rep. Saviello has two other bills that he foresees as having the same issue. One is for water quality that would affect Androscoggin River and the other is pertaining to company's duty to report when they spill oil. Mr. Wayne asked the Commission if he should develop something in writing at the staff level that includes what was discussed here today.

Mr. Ketterer felt that would be appropriate.

Agenda Item #5 - Complaints/Carol Grose and Susan Wasserott Campaigns postponed until May 14, Meeting

Agenda Item # 6 – Assessment of Civil Penalty for Late Filing/Hon. Kimberly Davis

Mr. Wayne explained briefly that Kimberly Davis ran for re-election in 2006, privately financed with a publicly funded opponent and should have filed an accelerated report on October 16, 2006. It was filed one day late, and she went over by \$67. Her opponent, Kim Silsby, who won the election, was not disadvantaged in any way. A penalty of \$67 is being recommended since Ms. Davis did not act in bad faith.

Kimberly Davis addressed the Commission. She thanked Sandy Thompson for all her help through her campaign.

Motion by Ms. Ginn Marvin to adopt the staff recommendation of \$67 penalty for late filing; seconded by Mr. Cassidy. The motion passed (5-0).

A fifteen minute recess was called.

Agenda Item #7 – So. Portland Democratic Committee Reconsideration postponed until 3/9/07

Agenda Item #8 -Request for Waiver of Late Filing Penalty/Opportunity Maine PAC

Jeremy Collette, Treasurer for Opportunity Maine addressed the Commission via phone.

Mr. Wayne briefly described the circumstances around the late filing of the PAC report. It should have been filed October 10, 2006, by 5:00 p.m. The report was filed seven minutes late. Mr. Wayne informed the group that the staff never grants waivers to penalties for late-filed reports because the 5:00 p.m. deadline is firm. The PAC did have a problem with his Macintosh computer and there is currently an issue with Apple computers being able to access the e-filing system. Because he was not able to use his computer, Mr. Collette moved to another computer but the delay caused him to be late. The staff feels he tried in good faith and believes the \$106 penalty should be waived.

Mr. Collette had no further comments.

Ms. Ginn Marvin recused herself from this matter since her nephew is active in Opportunity Maine.

Mr. Friedman moved to accept the Commission staff recommendation under the circumstances, the late filing penalty be waived; seconded by Ms. Thompson. The motion passed with Ms. Ginn Marvin abstaining.

Agenda Item #9 (Expenditure Reports) and #10 (Nancy Bessey penalty) moved to March 9.

Agenda Item #11 – Request for Waiver of Late Filing Penalty/Todd Brackett

Mr. Wayne explained that Mr. Brackett was running for county sheriff in Lincoln County in the general election. The request for waiver is from the Treasurer, Penelope Card. The report was due November 1, it was two days late, which would require a \$74.60 by statute. Ms. Card's reason for requesting the waiver was due to an accident on October 25 and a power outage shortly thereafter. The Commission staff feels a waiver is appropriate under the circumstances.

Ms. Ginn Marvin moved and Mr. Friedman seconded to adopt the staff recommendation of finding in violation but no penalty. The motion passed (5-0).

Agenda Item #12 – Request for Waiver of Late Filing Penalty/Christopher Wainwright

Mr. Wayne explained that Mr. Wainwright was a candidate for sheriff in Oxford County in the election. The request is brought by his Treasurer, Lynn Cameron. The report was due on December 19. Ms. Cameron's husband had a stroke two days before the report was due. She called one day late to notify the Commission of what was happening and she paid the penalty of \$20.18, recognizing that there may or may not be a waiver. The staff feels this is a valid reason for being late and recommends a waiver and refund of the penalty she paid.

Ms. Thompson moved and Mr. Friedman seconded to adopt the staff recommendation and refund Ms. Cameron her \$20.18 payment. The motion passed (5-0).

Agenda Item #13 – Request for Waiver of Late Filing Penalty/Gerald York

Mr. Wayne recommended a staff recommendation of a waiver for this penalty. Mr. York was running for county commissioner in Somerset County, filed one day late due to the fact his daughter-in-law was hospitalized for emergency surgery the day the report was due. Mr. York filed one day late.

Ms. Thompson moved and Mr. Friedman seconded to adopt the staff recommendation. The motion passed (5-0).

Agenda Items #14, 15 and 16 are rescheduled for March 9 Meeting

#14 Request for Waiver of Late Filing Penalty/Bernard Ayotte

#15 Referral to Attorney General for Failure to Pay Civil Penalty/David Hughes

#16 Referral to Attorney General for Failure to Pay Civil Penalty/Arthur Clement

Referrals to Attorney General for Collection of Unspent MCEA Funds:

Agenda Item #17 David Hughes was resolved.

Agenda Item #18 – Arthur Clement

Mr. Wayne explained that Mr. Clement declined to be present for this meeting. Mr. Clement is a former Legislator who ran as a Clean Election candidate for House district 29 in the 2006 general election. Mr. Clement originally was unresponsive to staff requests to return unspent MCEA funds. When he finally did come forward, he said that he received a check for approximately \$4,000 that he believed was a tax rebate, and he instructed his daughter to deposit it in his personal account since he was in Florida. He spent the money on personal expenses, including his mortgage. He knows he owes the State \$5,988 of unspent MCEA funds. Mr. Clement has proposed to repay this amount within a year, paying \$50 a month. Mr. Wayne expressed hesitation to work out an amicable plan, since Mr. Clement chose not to appear at this meeting to explain his case. Staff recommendation is to refer this case to the Attorney General's Office for civil action.

Ms. Thompson asked if there is anything on the check that indicates MCEA funds.

Sandy Thompson, candidate registrar, explained that Mr. Clement learned later what the money was for and still did not attempt to explain where the money had gone. He only indicated he had hoped to have the money back by the December 19th filing.

Mr. Cassidy noted that there is usually a voucher with any State check that explains what the funds are for and he supports the staff recommendation.

Ms. Gardiner asked what communication he received from the Commission that told him the check was a Clean Election check for his campaign.

Mr. Wayne explained that there is a form letter regarding initial MCEA payment and also one for the general election matching fund money.

Ms. Ginn Marvin asked what the check for \$6,949.33 represented.

Mr. Wayne clarified that Mr. Clement received matching funds that he was not authorized to spend and he refunded that amount (\$6,949.33). The money he was authorized to spend (\$5,988) he spent on personal expenses.

Ms. Gardiner noted that he wrote the check for return of unauthorized matching funds (\$6,949.33) out of his personal account and not his campaign account.

Mr. Lavin did clarify that the check does say “general election initial distribution” or “general election matching funds.”

Ms. Ginn Marvin suggested in the future redacting social security numbers on documents we have in the candidates’ files.

Ms. Gardiner pointed out that the facts suggest there may be commingling of funds in addition to the unauthorized funds still outstanding. She said additionally, the statute authorizes the

Commission to impose a penalty when a candidate fails to comply with the Clean Election Act rules, which may be the case if commingling of funds has in fact occurred. Additional fact-finding would determine this. Discussion followed on how to refer the case to the Attorney General's office, with the commingling of funds or just retrieval of the unauthorized funds.

Mr. Wayne pointed out that the other possible violations include commingling and spending the MCEA funds on personal expenses. If the Commission chooses to also take action on these issues, Mr. Wayne suggested putting off for one month and giving Mr. Clement a chance to respond again. The Commission could assess penalties at its next meeting and, if necessary, make a referral to the Attorney General.

Ms. Thompson and Mr. Cassidy supported this option, which would support penalties for mishandling and commingle of funds in addition to retrieval of the MCEA funds.

Ms. Thompson made a motion to refer this issue back to the staff to determine whether commingling and misuse of funds have occurred in addition to retrieval of unauthorized funds.

Seconded by Mr. Cassidy. The motion passed 4-0 (Mr. Ketterer abstaining).

The Commission further authorized Mr. Wayne to subpoena Mr. Clement's bank records by motion of Ms. Ginn Marvin, seconded by Mr. Friedman for the purpose of determining whether funds were misused. The motion passed 4-0 (Mr. Ketterer abstaining). Mr. Ketterer requested Ms. Ginn Marvin sign the subpoena due to his abstention.

Agenda Item #19 – Paul Nixon was resolved.

Agenda Item #20 – Debra Reagan

Mr. Wayne noted that Ms. Reagan has filed her final campaign finance report that shows a balance of unspent funds of \$4,518.00. Ms. Reagan is aware that she still owes this money. She has told the staff that she has not spent the money, but has not been able to be contacted since

mid-December 2006. Since she has not responded to several mailings and attempted phone calls, Mr. Wayne feels the only alternative is to refer the issue to the Attorney General.

Mr. Friedman made a motion to follow staff recommendation to refer this issue to the Attorney General's office for collection of unspent Clean Election funds totaling \$4,518; seconded by Ms. Thompson.

There being no discussion, the motion passed with a vote of 5-0.

Agenda Item #21 – Presentation of Audit Reports

Mr. Dinan, staff auditor, reported on the results of five audits. Four had no exceptions. Candidate Brian Rines, ran for senate in District #21, misreported on his 42-Day Post-Primary Report. The error appears to be an inadvertent error, after Commission staff notified Mr. Rines of the error, the report was amended. Mr. Dinan recommends finding in violation with no penalty.

Mr. Cassidy moved to accept the staff recommendation; the motion was seconded by Mr. Friedman. The motion passed by a vote of 5-0.

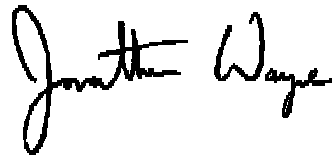
Agenda Item #22 – Subpoena of Bank Records of Thomas Bossie

Mr. Wayne explained three subpoenas that will be required; one for bank records, one for the Bridgton News, and one to Mr. Bossie. There have been a number of red flags beginning with routine reviews of his campaign finance reports through getting his Clean Election funds back from him after the election. The staff had a great deal of difficulty getting Mr. Bossie to return the balance of his unspent Clean Election funds. It was only after applying a lot of pressure, including a referral to the Attorney General, did Mr. Bossie return any funds and amend his final campaign finance report. The Maine Republican Party has also filed a complaint against Mr. Bossie alleging the misuse of public funds to pay for advertising for Mr. Bossie's business. Mr. Wayne indicated that looking at his bank records and other records to verify whether he actually spent the money as claimed in his campaign finance reports, whether he misused public funds for personal purposes, and to be sure he has returned all funds.

Ms. Ginn Marvin moved to adopt the staff recommendation to issue subpoenas to the Bridgton News, Evergreen Credit Union, and Mr. Bossie to obtain information necessary to balance the campaign account; the motion was seconded by Mr. Cassidy. The motion passed (5-0).

There being no further business, Ms. Ginn Marvin motioned to adjourn the meeting; Mr. Cassidy seconded.

Respectfully submitted,

A handwritten signature in black ink that reads "Jonathan Wayne". The signature is written in a cursive, flowing style.

Jonathan Wayne
Executive Director